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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

HEATHER BOONE and ROXANNE
RIVERA, on behalf of themselves and all
others similarly situated,

Plaintiffs,

CRISTIAN BARRERA, individually,

Plaintiff

v.

AMAZON.COM SERVICES, LLC,

Defendant.

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**JOINT STIPULATION TO EXTEND THE
DEADLINE TO FILE DISPOSITIONAL
PAPERS AND ~~PROPOSED~~ ORDER**

Case No. 1:21-CV-00241-NODJ-BAM – LEAD
Case No. 1:22-CV-00146-ADA-BAM-MEMBER

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Attorneys for Plaintiff Cristian Barrera

1 Plaintiffs Heather Boone, Roxanne Rivera, and Cristian Barrera and Defendant Amazon.com
2 Services LLC (collectively, the “Parties”), by and through their undersigned counsel of record, hereby
3 stipulate and request as follows:

4 WHEREAS, on August 22, 2023, the Parties submitted a Notice of Settlement informing the
5 Court that they had reached a tentative settlement;

6 WHEREAS, on August 23, 2023, the Court, pursuant to Local Rule 160, ordered that the Parties
7 file appropriate papers to dismiss or conclude this action in its entirety by September 12, 2023;

8 WHEREAS, on September 6, 2023, the Court extended the deadline to file dispositional papers
9 to November 13, 2023;

10 WHEREAS, on November 9, 2023, the Court further extended the deadline to file dispositional
11 papers to December 13, 2023;

12 WHEREAS, the Parties have continued to make significant progress but need additional time
13 to finalize and complete negotiations over the contents of a detailed long-form settlement agreement;

14 WHEREAS, because the long-form settlement agreement has not yet been finalized, Plaintiffs
15 need additional time to prepare a motion for preliminary approval of a class-wide settlement to address
16 the claims of more than 230,000 putative class members;

17 WHEREAS, Plaintiffs also need additional time to prepare a motion for preliminary approval
18 because the expert consultant who is assisting them with the preparation of data supporting the motion
19 has had conflicting obligations in November and December;

20 WHEREAS, the Parties are working diligently to complete the necessary dispositional papers
21 to submit to the Court, but, in light of these circumstances above, require additional time to complete
22 that work;

23 WHEREAS, the Parties respectfully submit that good cause exists for an extension of the
24 deadline to file dispositional papers with the Court, *see* Local Rule 160(b);

25 THEREFORE, IT IS STIPULATED AND REQUESTED THAT, by and between the
26 undersigned counsel, and subject to the Court’s approval, good cause exists to extend the December
27

1 13, 2023 deadline by 30 days such that the Parties may file appropriate papers to dismiss or conclude
2 this action in its entirety by January 12, 2024.

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4
5 AGREED TO BY:

6 Dated: December 11, 2023

HODGES & FOTY, LLP

7
8 By: /s/ Don J. Foty
Don J. Foty (admitted *pro hac vice*)
9 David W. Hodges (admitted *pro hac vice*)

10 *Attorneys for Plaintiffs Heather Boone and Roxanne*
11 *Rivera*

12 Dated: December 11, 2023

GIBSON, DUNN & CRUTCHER LLP

13 By: /s/ Bradley J. Hamburger
Bradley J. Hamburger
14 Tiffany Phan
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15 *Attorneys for Defendant Amazon.com Services LLC*

16 Dated: December 11, 2023

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17 By: /s/ Kyle J. Ignatius
Michael Nourmand
18 James A. De Sario
19 Kyle J. Ignatius

20 *Attorneys for Plaintiff Cristian Barrera*
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ORDER

Pursuant to the Parties' Joint Stipulation to Extend the Deadline to File Dispositional Papers, and good cause appearing, the deadline to file dispositional papers will be extended to accommodate the filing of a motion for preliminary approval of the class-wide settlement. *See* L.R. 160. The parties shall file their anticipated motion for preliminary approval no later than **February 16, 2024**.

IT IS SO ORDERED.

Dated: **December 11, 2023**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE